

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 13
)
KEVIN EDWARDS,)
) CASE NO. 14-55637-JRS
)
DEBTOR.)

**CHAPTER 13 TRUSTEE'S
SUPPLEMENTAL OBJECTION TO CONFIRMATION OF PLAN
& MOTION TO DISMISS CASE**

COMES NOW Adam M. Goodman, Chapter 13 Trustee, and Objects to Confirmation of the Plan and files this Motion to Dismiss Case under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The Chapter 13 Budget fails to provide for the monthly expense of post-petition income tax liability on self-employment income of \$7,100.00 per month, and tax escrow slips have not been submitted; thereby, indicating that the proposed budget and Plan are infeasible, 11 U.S.C. Section 1325(a)(6).

WHEREFORE, Trustee moves this Honorable Court to inquire into the above Objection to Confirmation of Plan and Motion to Dismiss Case at the separately scheduled and noticed Confirmation Hearing, deny Confirmation of the Chapter 13 Plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

/s/William A. Bozarth

William A. Bozarth

GA Bar No. 940530

Attorney for Standing Chapter 13 Trustee

Adam M. Goodman
Standing Chapter 13 Trustee
Suite 200 – 260 Peachtree Street, N.W.
Atlanta, Georgia 30303
(678) 510-1444

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CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR:

KEVIN EDWARDS
270 17TH STREET
UNIT 3904
ATLANTA, GA 30363

ATTORNEY FOR DEBTOR:

MEDLEY & ASSOCIATES
2727 PACES FERRY ROAD
BLDG. 2, SUITE 1770
ATLANTA, GA 30339

the above in the foregoing matter with a copy of this Supplemental Objection to Confirmation of Plan and Motion to Dismiss Case by depositing same in the United States Mail in a properly addressed envelope with adequate postage thereon.

This 4th day of June 2014.

/s/William A. Bozarth

William A. Bozarth
GA Bar No. 940530
Attorney for Standing Chapter 13 Trustee

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